



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 29, 2002

Reply To
Attn Of: ECL-113

Ms. Kathleen Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: Re-evaluation of the Final Remediation Goals for Mercury at the CFA-04 (CFA-674 Pond)

Dear Ms. Hain,

EPA received the draft of the above-referenced document on July 15, 2002 and submitted comments. EPA comments have been addressed and incorporated into the final version of the white paper received on October 21, 2002.

EPA agrees that it is appropriate to re-evaluate the FRG for mercury at the CFA-04 pond. The original FRG of 0.5 mg/kg mercury was based on a concentration of ten times background levels at the INEEL. The revised FRG is based on new information including new toxicity and fate and transport values which are listed in the white paper for both human health and ecological receptors. Using this new information, an FRG of 9.4 mg/kg and 8.4 mg/kg mercury was calculated for human and ecological receptors, respectively. The FRG of 8.4 mg/kg mercury was adopted to be protective of both human health and the environment. The new FRG is preliminary pending the results of field sampling which will determine the percentage of methyl mercury compared to total mercury in the soil at the CFA-04 pond. The results of field sampling will be evaluated in the draft CFA-04 Remedial Design/Remedial Action Work Plan which has been submitted to EPA and IDEQ.

EPA considers the FRG revision to be a significant change to the remedy and, therefore, an Explanation of Significant Differences will be required to document this change and provide for public notice. If there are any questions concerning this matter, please contact me at (206) 553-7261 or Kathy Ivy at (206) 553-0040.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Pierre", is written over a large, stylized, looped flourish that extends to the left and right.

Wayne Pierre,
INEEL Project Manager

cc: Kathy Ivy, EPA
Carol Hathaway, DOE-ID
Clyde Cody, IDEQ